

PENALTY COMPUTATION WORKSHEET

Company Name: Red Panther Chemical
Address: P. O. Box 550
Clarksdale, MS 38614

EPA ID# MSD 000 272 385

Requirement Violated: MHWMR 262.34(a)(4) and 265.35: Insufficient aisle space provided for between rows of containers in hazardous waste storage area.

Penalty Amount for Complaint

1. Gravity based penalty from matrix	\$ 1,000
(a)Potential for Harm	MINOR
(b)Extent of Deviation	MODERATE
2. Select an amount from the appropriate multiday matrix cell	N/A
3. Multiply line 2 by the number of days of violation minus 1 (or other number, as appropriate)	N/A
4. Add line 1 and line 3	\$ 1,000
5. Percent increase/decrease for good faith	0.00%
6. Percent increase for willingness/negligence	0.00%
7. Percent increase for history of noncompliance	0.00%
8. Total lines 5 thru 7*	0.00%
9. Multiply line 4 by line 8	\$0.00
10. Calculate economic benefit from noncompliance	\$0.00
11. Add lines 4, 9, and 10 for TOTAL penalty amount	\$ 1,000

NARRATIVE EXPLANATION FOR PENALTY AMOUNT

Red Panther Chemical
Clarksdale, Mississippi

REQUIREMENT VIOLATED: MHWMR 262.34(a)(4) and 265.35: The generator must maintain aisle space to allow for unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment.

1. Gravity Based Penalty

(a) Potential for Harm: MINOR - Adequate aisle space for a person to enter, much less emergency equipment, was not provided for between rows of containers. The facility's container storage area was located in a secure building with a concrete floor and spill prevention measures for liquid waste in place. This reduces the potential for harm to MINOR.

(b) Extent of Deviation: MODERATE - Mr. Gaston stated that he had brought the matter of storage space up in the past and nothing was done to improve the situation. Facility had numerous rows of containers labeled as hazardous waste that could not be reached for inspection or by emergency equipment. The container storage area did not have proper aisle space provided between drums such that all drums could be inspected even if facility was performing inspections. Due to this lack of concern over proper aisle space this is deemed a MODERATE Extent of Deviation from the requirements.

(c) Multiple/Multi-Day: Not Applicable - The violation cited does not warrant any multi-day penalty.

2. Adjustment Factors (Good Faith, Willfulness/negligence, History of noncompliance, Ability to Pay, Environmental Credit, and other unique factors, if applicable).

(a) Good Faith: Company was cooperative in the inspection and prompt in reply to request and response to violations. Company seems to have corrected most violations. These items, though appreciated, do not warrant a reduction in penalty according to the set guidelines.

(b) Willfulness/Negligence: Not Applicable - Not applicable to the violation cited.

(c) History of Noncompliance: Not Applicable

(d) Ability to Pay: Not Applicable at this time.

NARRATIVE EXPLANATION FOR PENALTY AMOUNT

(e) Environmental Project: Not Applicable.

(f) Other Unique Factors: Not Applicable.

3. Economic Benefit

No economic benefit from this violation.

4. Recalculation of Penalty Based on New Information

Not Applicable at this time.

PENALTY COMPUTATION WORKSHEET

Company Name: Red Panther Chemical
Address: P. O. Box 550
Clarksdale, MS 38614

EPA ID# MSD 000 272 385

Requirement Violated: MHWMR 262.34(a)(1)(ii) and 265.195: Facility was not performing daily inspections of hazardous waste tank storage area and ancilliary equipment.

Penalty Amount for Complaint

1. Gravity based penalty from matrix	\$ 1,000
(a)Potential for Harm	MINOR
(b)Extent of Deviation	MODERATE
2. Select an amount from the appropriate multiday matrix cell	N/A
3. Multiply line 2 by the number of days of violation minus 1 (or other number, as appropriate)	N/A
4. Add line 1 and line 3	\$ 1,000
5. Percent increase/decrease for good faith	0.00%
6. Percent increase for willingness/negligence	0.00%
7. Percent increase for history of noncompliance	0.00%
8. Total lines 5 thru 7*	0.00%
9. Multiply line 4 by line 8	\$0.00
10. Calculate economic benefit from noncompliance	\$0.00
11. Add lines 4, 9, and 10 for TOTAL penalty amount	\$ 1,000

NARRATIVE EXPLANATION FOR PENALTY AMOUNT

Red Panther Chemical
Clarksdale, Mississippi

REQUIREMENT VIOLATED: MHWMR 262.34(a)(1)(ii) and 265.195: The owner or operator must inspect any hazardous waste storage tank and its ancillary equipment at least once each operating day.

1. Gravity Based Penalty

(a) Potential for Harm: MINOR - Facility had no documentation of any inspections of its hazardous waste tank storage area. The tank did have a concrete base and containment wall to prevent runoff from any spills that might occur. This reduces the Potential for Harm to MINOR in this situation.

(b) Extent of Deviation: MODERATE - Facility had no documentation or record of any kind that inspections were being performed as required. The tanks looked to be in good condition but the ancillary equipment (piping) to and from the tanks looked to be of questionable integrity. The sump on the day of inspection was full from rainwater (raining at the time of the inspection).

(c) Multiple/Multi-Day: Not Applicable - The violation cited does not warrant any multi-day penalty.

2. Adjustment Factors (Good Faith, Willfulness/negligence, History of noncompliance, Ability to Pay, Environmental Credit, and other unique factors, if applicable).

(a) Good Faith: Company was cooperative in the inspection and prompt in reply to request and response to violations. Company seems to have corrected most violations. These items, though appreciated, do not warrant a reduction in penalty according to the set guidelines.

(b) Willfulness/Negligence: Not Applicable - Not applicable to the violation cited.

(c) History of Noncompliance: Not Applicable

(d) Ability to Pay: Not Applicable at this time.

NARRATIVE EXPLANATION FOR PENALTY AMOUNT

(e) Environmental Project: Not Applicable.

(f) Other Unique Factors: Not Applicable.

3. Economic Benefit

No economic benefit from this violation.

4. Recalculation of Penalty Based on New Information

Not Applicable at this time.



RECEIVED
OCT - 2 1996
Dept. of Environmental Quality
Office of Pollution Control

RED PANTHER CHEMICAL COMPANY/P.O. BOX 550/CLARKSDALE, MS 38614 PH. (601) 627-4731

SEPTEMBER 30, 1996

TO: RICHARD HARRELL, MS. DEQ.
FROM: DAVID COLEMAN, RED PANTHER CHEMICAL COMPANY
RE: INSPECTION REPORT OF RED PANTHER DATED AUGUST 29, 1996

DEAR MR. HARRELL

LISTED BELOW ARE THE RESPONSES TO THE VIOLATIONS LISTED IN YOUR LETTER OF SEPTEMBER 17, 1996.

1. MHWMR 268.7 (a)(7): RED PANTHER IS IN THE PROCESS OF OBTAINING MISSING 5 LAND BAN NOTIFICATIONS THAT WERE IN QUESTION. THIS SHOULD BE COMPLETE BY MID-SEPTEMBER.
2. MHWMR 262.34 (a)(1)(i) AND 265.174: RED PANTHER NOW HAS AN INSPECTION LOG FOR THE HAZARDOUS WASTE STORAGE AREA. THIS WILL BE INCLUDED IN OUR DAILY INVENTORY OF THE AREA.
3. MHWMR 262.34 (a)(4) AND 262.35: DURING YOUR VISIT, RED PANTHER WAS IN THE PROCESS OF GETTING DRUMS OF HAZARDOUS WASTE READY FOR SHIPMENT AND THIS ACCOUNTED FOR SOME OF THE CONGESTION. HOWEVER, IN THE FUTURE, ADEQUATE AISLE SPACE WILL BE PROVIDED FOR. THIS SHOULD BE COMPLETE BY MID- SEPT.
4. MHWMR 262.34 (a)(i)(ii) AND 265.195: RED PANTHER HAS INCLUDED THE HAZARDOUS WASTE STORAGE TANKS IN ITS DAILY PLANT INSPECTION ROUTINE.

IF YOU SHOULD HAVE ANY QUESTIONS TO THE ABOVE RESONSES, PLEASE DO NOT HESITATE TO CALL. 601-627-4731 EXT 3029

REGARDS,

DAVID COLEMAN
RED PANTHER CHEMICAL COMPANY



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE COPY

September 17, 1996

CERTIFIED MAIL NO. Z 156 165 080

Mr. Bob Gaston
Red Panther Chemical Co.
P. O. Box 55
Clarksdale, Mississippi 38614

Re: Hazardous Waste Generator
Inspection of Red Panther Chemical

Dear Mr. Coleman,

Enclosed please find our inspection report and checklist that were completed as a result of a Compliance Evaluation Inspection (CEI) at Red Panther Chemical Company, Clarksdale, Mississippi on August 29, 1996. This inspection revealed the following violations of Mississippi Hazardous Waste Management Regulations (MHWMR).

1. MHWMR 268.7(a)(7): The generator must retain on-site for five years copy of all certifications, waste analysis, supporting data, manifests, and other documentation for waste subject to the land disposal restrictions. Generator was missing five copies of the "Land Ban Notifications" for their hazardous waste shipments.
2. MHWMR 262.34(a)(1)(i) and 265.174: The generator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. Facility had no inspection log for the hazardous waste container storage area.
3. MHWMR 262.34(a)(4) and 265.35: The generator must maintain aisle space to allow for unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment. Adequate aisle space was not provided for between rows in the hazardous waste storage area to allow for container inspections or for emergency equipment.

Bob Gaston
Page 2 of 2
September 10, 1996

4. MHWMR 262.34(a)(1)(ii) and 265.195: The owner or operator must inspect any hazardous waste storage tank and its ancillary equipment at least once each operating day. Facility had no documentation of such inspections.

If not already corrected Red Panther Chemical needs obtain copies of the "Land Ban Notification" for each hazardous waste manifest subject to the land disposal restrictions. The facility should begin documentation as required in items 2 and 4 above. Required aisle space should be provided for as specified.

We request that you respond to these violations within 10 days of receipt of this letter. This response should contain: (1) actions that you have taken to correct the violation, (2) schedule for correcting the violation, or (3) reasons that you believe the alleged violations did not exist. The Office of Pollution Control will review this information before determining if further action including a penalty is warranted. Section § 17-17-29 of the Mississippi Code Annotated (Supp. 1991) allows assessments of penalties no more than \$25,000 per day per violation. Failure to submit this information may result in enforcement action.

If you have any questions please don't hesitate to contact me at (601) 961-5343. Thank you for your time and cooperation.

Sincerely,



Richard Harrell
Hazardous Waste Division

RH
Enclosures
cc: Mr. James S. Kutzman, EPA (w/ enclosures)

RCRA INSPECTION REPORT

1. Inspector and Author of Report

Richard Harrell
Mississippi Department of Environmental Quality - MSDEQ
Office of Pollution Control

2. Facility Information

Red Panther Chemical Company
P. O. Box 550
Clarksdale, Mississippi 38614

EPA ID# MSD 000 272 385
Coahoma County

3. Responsible Company Official

Bob Gaston - SHE Coordinator

4. Inspection Participants

Richard Harrell - MSDEQ
David Coleman - Red Panther Chemical
Bob Gaston - Red Panther Chemical

5. Date and Time of Inspection

August 29, 1996 at 13:05

6. Applicable Regulations

Mississippi Hazardous Waste Management Regulation (MHWMR) Part 261, 262, 265.16 subpart C, D and I, and Part 268.

7. Purpose of Inspection

Compliance Evaluation Inspection (CEI) to determine facility's compliance with the Mississippi Hazardous Waste Management Regulations (MHWMR).

RCRA INSPECTION REPORT

8. Facility Description

Red Panther Chemical Company, Clarksdale, Mississippi is a herbicide\pesticide formulator. The facility receives the chemicals in bulk form and simply mixes and/or repackages them into smaller user sizes. Normally no production or manufacturing of chemicals is performed at this site. However, the facility did have a contractor come into the facility for a new gel delivery system. This gel was produced at facility for a short time. The facility consists of various lines for mixing or formulating and packaging the product. These areas were not looked at specifically since they require protective clothing and full face respirators.

9. Findings

Red Panther Chemical located in Clarksdale, Mississippi, is a Large Quantity Generator (LQG). The facility is currently classified as a Large Quantity Generator (LQG). The primary hazardous wastes generated are product waste liners (P066) and process wash water (D004). Occasionally shipments of waste or off-specification product are sent for disposal.

The hazardous waste liners are sent to the Dupont facility in Delaware (EPA ID# DED 003 930 807) for disposal. The liners are accumulated on the line in 55-gallon containers. Once full these containers are moved to the Less than 90 day storage area. The "Less Than 90 Day Storage Area" was very clean and but there did not appear to be adequate aisle space between rows of drums. The pallets of drums/containers were stacked directly next to each other, such that it was impossible to reach the rear drums for inspection and/or dates. The storage area was located in a separate building from the packaging operation. The storage area was separated by posts into the flooring cement with cable strung around the perimeter with "Hazardous Waste" signs on the cable between posts. The hazardous waste storage area was bermed for spill control. However, a large portion of hazardous waste labeled material was located outside this bermed area. Mr. Gaston stated the contents of these drums/containers were mostly labels and liners, that is no waste liquid materials. He stated that it is Dupont's practice to dispose of all labels, liners, and packaging as hazardous waste rather than sending the material to a solid waste landfill and have it appear that a hazardous waste was improperly disposed. There was no inspection log kept for the storage area showing weekly inspections.

The process wash water is stored in two 6,000 gallon tanks. The process wash water is hard piped directly into these tanks. The tanks were labeled as to their contents and closed. All valves and fittings looked to be in good shape. The tanks were placed in a concreted area with signs posted prohibiting entrance into the bermed area of the tanks. The area looked very neat and clean. No signs of spillage or leaking were observed in the area. The process wash water (D004) is shipped by tanker truck to Rollins Environmental in Louisiana (EPA

RCRA INSPECTION REPORT

ID# LAD 000 778 514) for deep well injection. Facility had no inspection log or documentation showing daily inspections and/or operating log for the tanks.

The facility's employee training appeared to be adequate from the records reviewed. The date of last employee training was in December of 1995. The training was performed for all full time employees. The facility recently participated in an emergency drill in conjunction with the local hospital and County Emergency Officer. This drill consisted of a staged accident/spill with numerous employees being contaminated and in need of medical attention. This drill was performed to instruct facility employees and hospital personnel in proper decontamination procedures and the hazards posed by the materials present at the facility. The facility's contingency plan seemed adequate and included evacuation routes and meeting areas so that all employees could be accounted for in the event of an emergency.

The facility's manifests and land ban notifications were not well kept. Facility was missing five "Land Ban Notification" for its hazardous waste manifested off site and two signed returned manifests.

10. Conclusion

Red Panther Chemical Company, Clarksdale, Mississippi, is currently classified as a Large Quantity Generator (LQG). The facility is in violation of the following Mississippi Hazardous Waste Management Regulations (MHWMR):

1. MHWMR 268.7(a)(7): Generators must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at least five years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. The five year record retention is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator. The requirements of this paragraph apply to solid wastes even when the hazardous characteristic is removed prior to disposal, or when the waste is excluded from the definition of hazardous or solid waste under 40 CFR 261.2 through 261.6, or exempted from RCRA subtitle C regulation, subsequent to the point of generation. Facility did not have "Land Ban Notification" copies for five hazardous waste shipments subject to the land disposal restrictions.
2. MHWMR 262.34(a)(1)(i) and 265.174: The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion of other factors. Facility did not have any documentation showing weekly inspections of its hazardous waste storage area.

RCRA INSPECTION REPORT

3. **MHWMR 262.34(a)(4) and 265.35:** The owner or operator must maintain aisle space to allow for unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes. Facility did not provide for proper aisle space in its hazardous waste storage area. There was insufficient aisle space to reach the rear containers for inspection much less for an emergency.

4. **MHWMR 262.34(a)(1)(ii) and 265.195:**
 - (a) The owner or operator must inspect, where present, at least once each operating day:
 - (1) Overfill/spill control equipment to ensure that it is in good working order;
 - (2) The aboveground portions of the tank system, if any, to detect corrosion or release of waste;
 - (3) Data gathered from monitoring equipment and leak detection equipment to ensure that the tank system is being operated according to its design; and
 - (4) The construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures to detect erosion or signs of releases of hazardous waste.

 - (b) ...

 - (c) The owner or operator must document in the operating record of the facility an inspection of those items in paragraphs (a) and (b) of this section.

Facility had no documentation for such inspections and indicated inspections were not being performed on a daily basis as required.

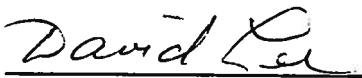
RCRA INSPECTION REPORT

11. **Signed**



Richard Harrell

12. **Approved**



David Lee

cc: Mr. G. Alan Farmer, EPA



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE COPY

April 5, 1994

CERTIFIED MAIL NO. Z 711 069 208

Mr. David Coleman
Red Panther Chemical Co.
P. O. Box 55
Clarksdale, Mississippi 38614

Re: Hazardous Waste Generator
Inspection of Red Panther Chemical

Dear Mr. Coleman,

Enclosed please find our inspection report and checklist that were completed as a result of a Compliance Evaluation Inspection (CEI) at Red Panther Chemical Company, Clarksdale, Mississippi on March 31, 1994. This inspection revealed the following violations of Mississippi Hazardous Waste Management Regulations (MHWMR).

1. MHWMR 268.6(a)(6): The generator must retain on-site for five years copy of all certifications, waste analysis, supporting data, manifests, and other documentation for waste subject to the land disposal restrictions. Generator was missing all but one copy of the "Land Ban Notifications" for their hazardous waste.
2. MHWMR 265.16(d): The generator must maintain the following documents and records at the facility:
 - (a) Job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
 - (b) A written job description for each position listed under paragraph (a) above. The description must be consistent with other similar positions in the company but must include the requisite skill,

David Coleman
Page 2 of 2
April 5, 1994

education, or other qualifications and duties of facility personnel assigned to each position.

- (c) Written description of the type and amount of both introductory and continuing training that will be given to each position filling a position.

Facility did not have all of the documentation required in (a) (b), and (c) above.

If not already corrected Red Panther Chemical needs obtain copies of the "Land Ban Notification" for each hazardous waste manifest subject to the land disposal restrictions. The facility should begin preparing the records deficient in number 2 above.

We request that you respond to these violations within 10 days of receipt of this letter. This response should contain: (1) actions that you have taken to correct the violation, (2) schedule for correcting the violation, or (3) reasons that you believe the alleged violations did not exist. The Office of Pollution Control will review this information before determining if further action including a penalty is warranted. Section § 17-17-29 of the Mississippi Code Annotated (Supp. 1991) allows assessments of penalties no more than \$25,000 per day per violation. Failure to submit this information may result in enforcement action.

If you have any questions please don't hesitate to contact me at (601) 961-5343. Thank you for your time and cooperation.

Sincerely,



Richard Harrell
Hazardous Waste Division

RH
Enclosures
cc: Mr. James S. Kutzman, EPA (w/ enclosures)

RCRA INSPECTION REPORT

1. Inspector and Author of Report

Richard Harrell
Mississippi Department of Environmental Quality - MSDEQ
Office of Pollution Control

2. Facility Information

Red Panther Chemical Company
P. O. Box 550
Clarksdale, Mississippi 38614

EPA ID# MSD 000 272 385
Coahoma County

3. Responsible Company Official

Mr. David Coleman - QC Manager

4. Inspection Participants

Richard Harrell - MSDEQ
David Coleman - Red Panther Chemical
Donald Keenum - Red Panther Chemical

5. Date and Time of Inspection

March 31, 1994, 10:00 a.m.

6. Applicable Regulations

Mississippi Hazardous Waste Management Regulation (MHWMR) Part 261, 262, 265.16 subpart C, D and I, and Part 268.

7. Purpose of Inspection

Compliance Evaluation Inspection (CEI) to determine facility's compliance with the Mississippi Hazardous Waste Management Regulations (MHWMR).

RCRA INSPECTION REPORT

8. Facility Description

Red Panther Chemical Company, Clarksdale, Mississippi is a herbicide\pesticide formulator. The facility receives the chemicals in bulk form and simply mixes and/or repackages them into smaller user sizes. No production or manufacturing of chemicals is performed at this site. The facility consist of various lines for mixing or formulating and packaging the product. These areas were not looked at specifically since they require protective clothing and full face respirators.

9. Findings

Red Panther Chemical located in Clarksdale, Mississippi, is a Large Quantity Generator (LQG). The facility is currently classified as a Large Quantity Generator (LQG). The primary hazardous waste generated are product waste liners (P066) and process wash water (D004). Occasionally shipments of waste or off-specification product are sent for disposal.

The hazardous waste liners are sent to the Dupont facility in Delaware (EPA ID# DED 003 930 807) for disposal. The liners are accumulated on the line in 55-gallon containers. Once full these containers are moved to the Less than 90 day storage area. The "Less Than 90 Day Storage Area" was very clean and well kept. The storage area was located in a separate building from the manufacturing. The storage area was separated by posts into the flooring cement with cable strung around the perimeter with "Hazardous Waste" signs on the cable between posts. The hazardous waste storage area was bermed for spill control. At the time of the inspection facility had no hazardous waste in the storage area.

The process wash water is stored in two 6,000 gallon tanks. The process wash water is hard piped directly into these tanks. The tanks were labeled as to their contents and closed. All valves and fittings looked to be in good shape. The tanks were placed in a concreted area with signs posted prohibiting entrance into the bermed area of the tanks. The area looked very neat and clean. No signs of spillage or leaking were observed in the area. The process wash water (D004) is shipped by tanker truck to Rollins Environmental in Louisiana (EPA ID# LAD 000 778 514) for deep well injection.

The facility's employee training program seemed to be very good. There were three new employees undergoing training at the time of the inspection. From the observation of part of the program, it seemed to be very well prepared. However, the facility was deficient in some of the record keeping for position records and training. Donald Keenum, Safety Coordinator, went over the on the job training and instruction the employees receive. He was advised that this training was more than sufficient but records need to be kept of all training

RCRA INSPECTION REPORT

employees receive.

The facility's manifest and land ban notifications were not very well kept or organized. Facility was missing all but one "Land Ban Notification" for its hazardous waste manifested off site. All return manifests were kept.

10. Conclusion

Red Panther Chemical Company, Clarksdale, Mississippi, is currently classified as a Large Quantity Generator (LQG). The facility is in violation of the following Mississippi Hazardous Waste Management Regulations (MHWMR):

1. MHWMR 268.6(a)(6): Facility did not have "Land Ban Notification" copies for all hazardous waste shipped off site subject to the land disposal restrictions.
2. MHWMR 265.16(d): Facility did not maintain a listing of each position at the facility related to hazardous waste management and the name of the employee filling each job.

11. Signed



Richard Harrell

12. Approved



David Lee

cc: Mr. G. Alan Farmer, EPA

Handwritten: 1315 26144

BEFOI MSD000272385
 SITE RED PANTHER CHEMICAL COMPANY
 EPA I DAVID COLEMAN
 P.O. BOX 550
 CLARKSDALE, MS 38614



U.S. ENVIRONMENTAL PROTECTION AGENCY

1993 Hazardous Waste Report

RECEIVED
 JAN 26 1994
 IDENTIFICATION AND CERTIFICATION
 Dept. of Environmental Quality
 Office of Pollution Control

FORM IC

INSTRUCTIONS: Read the detailed instructions beginning on page 8 of the 1993 Hazardous Waste Report booklet before completing this form.

Sec. I Site name and location address. Complete A through H. Check the box in items A, C, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instruction page 10.

A. EPA ID No. Same as label or → _____
 B. County Cochema
 C. Site/company name Same as label or → _____
 D. Has the site name associated with this EPA ID changed since 1991? 1 Yes 2 No
 E. Street name and number. If not applicable, enter industrial park, building name, or other physical location description. Same as label or → _____
 F. City, town, village, etc. Same as label or → _____
 G. State Same as label _____
 H. Zip Code Same as label _____

Sec. II Mailing address of site. Instruction page 10.

A. Is the mailing address the same as the location address? 1 Yes (SKIP TO SEC. III) 2 No (GO TO BOX B)

B. Number and street name of mailing address _____
 C. City, town, village, etc. _____
 D. State _____
 E. Zip Code _____

Sec. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page 10.

A. Please print: Last Name First name M.I. Coleman David W.
 B. Title QC Manager
 C. Telephone 601 627-4731
 Extension 29

Sec. IV "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations."

A. Please print: Last Name First name M.I. Coleman David W.
 B. Title Quality Control Manager
 C. Signature David W. Coleman
 D. Date of signature 01 24 94
 MO. DAY YR.



U.S. ENVIRONMENTAL PROTECTION AGENCY

1993 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

BEFORE C MS0000272385
 SITE NAM RED PANTHER CHEMICAL COMPANY
 EPA ID NC DAVID COLEMAN
 P.O. BOX 550
 CLARKSDALE, MS 38614

INSTRUCTIONS: Read the detailed instructions beginning on page 18 of the 1993 Hazardous Waste Report booklet before completing this form.

Sec. I A. Waste description - Instruction page 18.
 Wash water contaminated with a trace of Arsenic

B. EPA hazardous waste code Page 19. D004
 C. State hazardous waste code Page 19.

D. SIC code Page 19. 2879
 E. Origin code Page 19 System Type LM
 F. Source code Page 20. A31
 G. Point of measurement Page 20. 8
 H. Form code Page 20. B1103
 I. RCRA - radioactive mixed Page 20. 2

Sec. II A. Quantity generated in 1992 Instruction Page 21. 2,344.0
 B. Quantity generated in 1993 Page 21. 438.240, 528.00.0
 C. UOM Page 21. 5
 Density Page 21. 8.30
 D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
 1 Yes (CONTINUE TO SYSTEM 1)
 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1
 On-site process system type Page 22. LM134
 Quantity treated, disposed, or recycled on site in 1993. 528.00.0

ON-SITE PROCESS SYSTEM 2
 On-site process system type Page 22. LM
 Quantity treated, disposed, or recycled on site in 1993.

Sec. III A. Was any of this waste shipped off-site in 1993
 1 Yes (CONTINUE TO BOX B)
 2 No (SKIP TO SEC IV)

Site 1	B. EPA ID No. of facility waste was shipped to Page 23. LA000778514	C. System type shipped to Page 23. LM134	D. Off-site availability code Page 23. 1	E. Total quantity shipped in 1993 Page 23. 528.00.0
Site 2	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to Page 23. LM	D. Off-site availability code Page 23.	E. Total quantity shipped in 1993 Page 23.

Sec. IV A. Did new activities in 1993 result in minimization of this waste? 1 Yes (CONTINUE TO SYSTEM 1)
 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24. LW
 C. Other effects Page 24. 1 Yes
 2 No
 D. Quantity recycled in 1993 due to new activities Page 25.
 E. Activity/production index Page 25.
 F. 1993 source reduction quantity Page 28.

Comments:



U.S. ENVIRONMENTAL PROTECTION AGENCY

1993 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

FORM GM

BEFORE F
 SITE NAME MSD000272385
 RED PANTHER CHEMICAL COMPANY
 EPA ID N DAVID COLEMAN
 P.O. BOX 550
 CLARKSDALE, MS 38614

INSTRUCTIONS: Read the detailed instructions beginning on page 18 of the 1993 Hazardous Waste Report booklet before completing this form.

Sec. I A. Waste description - Instruction page 18.
Drum liners contaminated with Carbamate Pesticide

B. EPA hazardous waste code Page 18. P066

C. State hazardous waste code Page 19.

D. SIC code Page 19. 2879

E. Origin code Page 19 System Type LM

F. Source code Page 20. A35

G. Point of measurement Page 20. 8

H. Form code Page 20. B406

I. RCRA - radioactive mixed Page 20. 2

Sec. II A. Quantity generated in 1992 Instruction Page 21. 6989.0

B. Quantity generated in 1993 Page 21. 4135.0

C. UOM Page 21. L Density 1 lbs/gal 2 sg

D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
 1 Yes (CONTINUE TO SYSTEM 1)
 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type Page 22. LM043

Quantity treated, disposed, or recycled on site in 1993 4135.0

ON-SITE PROCESS SYSTEM 2

On-site process system type Page 22. LM

Quantity treated, disposed, or recycled on site in 1993

Sec. III A. Was any of this waste shipped off-site in 1993 1 Yes (CONTINUE TO BOX B) 2 No (SKIP TO SEC IV) Instruction page 23.

Site 1	B. EPA ID No. of facility waste was shipped to Page 23. <u>DEED 003 930 807</u>	C. System type shipped to Page 23. <u>LM043</u>	D. Off-site availability code Page 23. <u>2</u>	E. Total quantity shipped in 1993 Page 23. <u>4135.0</u>
Site 2	B. EPA ID No. of facility waste was shipped to Page 23.	C. System type shipped to Page 23. <u>LM</u>	D. Off-site availability code Page 23.	E. Total quantity shipped in 1993 Page 23.

Sec. IV A. Did new activities in 1993 result in minimization of this waste? 1 Yes (CONTINUE TO SYSTEM 1) 2 No (THIS FORM IS COMPLETE) Instruction page 24.

B. Activity Page 24. <u>W</u>	C. Other effects Page 24. <input type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No	D. Quantity recycled in 1993 due to new activities Page 25.	E. Activity/production index Page 25.	F. 1993 source reduction quantity Page 26.
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Comments:



U.S. ENVIRONMENTAL PROTECTION AGENCY

1993 Hazardous Waste Report



WASTE GENERATION AND MANAGEMENT

BEFORE CG
 SITE NAME
 EPA ID NO.

MSD000272385
 RED PANTHER CHEMICAL COMPANY
 DAVID COLEMAN
 P.O. BOX 550
 CLARKSDALE, MS 38614

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1993 Hazardous Waste Report booklet before completing this form.

Sec. I A. Waste description - Instruction page 18.
Wash Water contaminated with Carbamate Pesticide

B. EPA hazardous waste code Page 18. P066

C. State hazardous waste code Page 19.

D. SIC code Page 19. 2879

E. Origin code System Page 19. LM

F. Source code Page 20. LA31

G. Point of measurement Page 20. 8

H. Form code Page 20. LB103

I. RCRA - radioactive mixed Page 20. 2

Sec. II A. Quantity generated in 1992 Instruction Page 21. 0.0

B. Quantity generated in 1993 Page 21. 5935
715.0

C. UOM Page 21. 5 Density 8.30
 lbs/gal 2 sg

D. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? Page 21.
 1 Yes (CONTINUE TO SYSTEM 1)
 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1
 On-site process system type Page 22. LM041
 Quantity treated, disposed, or recycled on site in 1993 715.0

ON-SITE PROCESS SYSTEM 2
 On-site process system type Page 22. LM
 Quantity treated, disposed, or recycled on site in 1993

Sec. III A. Was any of this waste shipped off-site in 1993? 1 Yes (CONTINUE TO BOX B) 2 No (SKIP TO SEC IV)

Site 1 B. EPA ID No. of facility waste was shipped to Page 23. DE003930307

C. System type shipped to Page 23. LM041

D. Off-site availability code Page 23. 2

E. Total quantity shipped in 1993 Page 23. 715.0

Site 2 B. EPA ID No. of facility waste was shipped to Page 23.

C. System type shipped to Page 23. LM

D. Off-site availability code Page 23.

E. Total quantity shipped in 1993 Page 23.

Sec. IV A. Did new activities in 1993 result in minimization of this waste? 1 Yes (CONTINUE TO SYSTEM 1) 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24. W W W W

C. Other effects Page 24. 1 Yes 2 No

D. Quantity recycled in 1993 due to new activities Page 25.

E. Activity/production index Page 25.

F. 1993 source reduction quantity Page 28.

Comments:



U.S. ENVIRONMENTAL PROTECTION AGENCY

1993 Hazardous Waste Report



WASTE RECEIVED FROM OFF-SITE

BEFI MSD000272385
 SITE RED PANTHER CHEMICAL COMPANY --
 DAVID COLEMAN --
 EPA P.O. BOX 550
 CLARKSDALE, MS 38614

INSTRUCTIONS: Read the detailed instructions beginning on page 30 of the 1993 Hazardous Waste Report booklet before completing this form.

Waste 1	A. Description of hazardous waste Instruction page 30. N/A	B. EPA hazardous waste code Page 31. _____ _____	C. State hazardous waste code Page 31. _____ _____
D. Off-site source EPA ID number Page 31. _____ _____		E. Quantity received in 1993 Page 31. _____ _____	F. UOM Page 31. _____ Density _____*_____ <input type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg
G. Waste form code Page 32. [B]_____	H. RCRA-radioactive mixed Page 32. <input type="checkbox"/>	I. System type Page 32. [M]_____	

Waste 2	A. Description of hazardous waste Instruction page 30.	B. EPA hazardous waste code Page 31. _____ _____	C. State hazardous waste code Page 31. _____ _____
D. Off-site source EPA ID number Page 31. _____ _____		E. Quantity received in 1993 Page 31. _____ _____	F. UOM Page 31. _____ Density _____*_____ <input type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg
G. Waste form code Page 32. [B]_____	H. RCRA-radioactive mixed Page 32. <input type="checkbox"/>	I. System type Page 32. [M]_____	

Waste 3	A. Description of hazardous waste Instruction page 30.	B. EPA hazardous waste code Page 31. _____ _____	C. State hazardous waste code Page 31. _____ _____
D. Off-site source EPA ID number Page 31. _____ _____		E. Quantity received in 1993 Page 31. _____ _____	F. UOM Page 31. _____ Density _____*_____ <input type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg
G. Waste form code Page 32. [B]_____	H. RCRA-radioactive mixed Page 32. <input type="checkbox"/>	I. System type Page 32. [M]_____	

Comments:

David Coleman, QC Manager

3/31/94
10:00 a.m.

Employee Training

- Video \bar{c} testing afterwards for Haz. waste handling
- Right-to-know, video \bar{c} testing afterwards
- Employees fit tested \bar{c} respirators and proper usage.
- All employees go through both programs \bar{c} annual updates. Approximately 100 employees currently. Very seasonal, — down to 40 on non-peak times.
- Files are kept on computer and hard copy.
-

Manifest

94

Latest

03/01/94

- Dupont

DED 003 930 807

Transporter

-

Tri State

Motor

Transit

MOD 095 038 998

5 drums, 2250 lbs,

P066

Waste carbamate

pesticide,

03/25/94

- Rollins

Env.

LAD 000 778 514

Deep Well Injection

001 TT

, 04600 gal

D004

Arsenic Compound, Liquid

- Transporter, Rollins.

→ No Land Ban Notifications

General Requirements

- Internal paging (loudspeaker) system
- Fire Dept tours twice a yr
- County & City, ~~two~~ emergency officials sent contingency plan.

②

Storage

- Process Wash Water
2 x 6,000 gal tanks

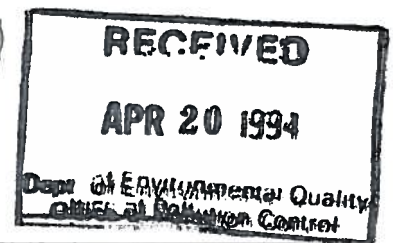
Labeled "Process Wash Water"

Both looked very clean

No drippage at all at valves

90 Day Storage Area

- Cordoned off
- clearly labeled
- Diked with sump hole
- fire ext. located next.



RED PANTHER CHEMICAL COMPANY/P.O. BOX 550/CLARKSDALE, MS 38614 PH. (601) 627-4731

April 15, 1994

Richard Harrell
State of Mississippi
Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Harrell,

Please find the enclosed documentation that you requested following your compliance inspection on March 31, 1994. I have included 2 job applications with job descriptions and the land ban forms for DuPont hazardous waste, as well as a Rollins Environmental Services land ban. I hope this is the information you need.

If there is additional documentation required, please call me at (601) 627-4731.

Regards,

David W. Coleman
Assistant General Manager

DWC/rbl

encl.

NO "Migration Variance"

ROLLINS ENVIRONMENTAL SERVICES

LAND DISPOSAL RESTRICTION NOTIFICATION (per 40 CFR 268.7)

-- WASTEWATER --

INSTRUCTION: Complete Part I. Check and complete Part II or Part III. Complete and sign Part IV.

PART I: Generator, Reference and Manifest Information

- 1. Generator Name: Red Panther Chemical Co. EPA ID #: MSD000212385
2. Address: Normand...
3. City: C Richard Zip: 38614
4. RES Refe.
5. EPA Waste

this is the Land Ban Form

6. This stream is If a nonwaste

PART II: Wastes Subject to Land Disposal Restrictions

Pursuant to 40 CFR RES Reference and manifest which is subject to the EPA

A. Check line 1.

- 1. Treat
2. Number
3. Treatment standard(s) expressed as specified technology(ies) in 40 CFR 268.42(a)
4. Numerical treatment standard(s) specified in 40 CFR 268.43(a)
5. This waste is (check one) an "Appendix IV lab pack" or an "Appendix V lab pack".

B. Also check one or more of the following lines if applicable

- 6. A D001-D011 waste which (a) does (b) does not meet the definition of a "California List" waste
7. Treatment standard(s) with a "capacity variance" until May 6, 1992, per Attachment 3
8. A nickel or thallium "California List" waste
9. A specific extension or variance (other than a "capacity variance")
10. The waste already meets relevant treatment standards.

PART III: Wastes NOT Subject to Land Disposal Restrictions

Pursuant to 40 CFR 268.7, I am notifying RES(LA); RES(NJ); RES(TX); RES of LA; OPC; TET that, under the above reference and manifest numbers, I am shipping to you a waste which is non-hazardous and/or identified by the EPA waste code(s) listed in Part I above.

PART IV: Authorized Representative

Signature: David Coleman Date:
Print or Type Name: David Coleman
Title: Quality Control Manager

NOTE: A "California List" waste is (a) a hazardous waste containing Halogenated Organic Compounds at a concentration of 1000 mg/kg or mg/l, or greater; or (b) a liquid hazardous waste (including free liquids) having a pH equal to or less than 2.0 or containing any of the following materials at a concentration equal to or greater than specified: PCB's, 50 ppm; or (in mg/l) free cyanides, 1000; Ar, 500; Cd, 100; Cr, 500; Pb, 500; Hg, 20; Ni, 134; Se, 100; Tl, 130.

APPLICATION FOR EMPLOYMENT

AN EQUAL OPPORTUNITY EMPLOYER

All statements made by applicants for employment on this application form will be checked for accuracy. We offer equal employment opportunities to all persons without regard to race, color, religion, age, marital or veterans' status, sex, national origin, disability, or any other legally protected status.

AN EQUAL OPPORTUNITY EMPLOYER

PERSONAL INFORMATION

Name (Print) Sandeep Kemp Home or Nearest Phone 627-3913
 Present Address 905 SASS ST # 13 Bldg 2 Emergency Phone Number 627-3913 *Sister*
Clarksdale Miss. 38614 Social Security No. 627 133 5035 *PLUB4*

City (State) (Zip)

If at present address less than one year, please give Previous Address Same 7 years

Are you over the age of 18? Yes No If No, employment is subject to verification that you are of minimum legal age.

Are you prevented from lawfully becoming employed in this country because of Visa or Immigration status? Yes No

Can you produce documented proof of your eligibility for employment in the United States? Yes No
(Either driver's license and Social Security card/birth certificate OR Immigration and Naturalization Service Documents)

Position(s) applied for Job Available Available How soon could you report to work? today

Type of employment Full-Time Part-Time Temporary Rate of Pay Expected m.u. 4.75

What days and hours, if part time? Days _____ Hours 7.00 7.00
From () AM () PM To () AM () PM

EDUCATION

Type of School	Name and Address of School	Courses Majored In	Check Last Year Completed				Graduate? Give Degree
			5	6	7	8	
Elementary	<u>Booker T Washington</u>	<u>English, science</u>					
High School	<u>Clarksdale High</u>					<u>12</u>	<u>83</u>
College	<u>Northwest College</u>		<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	

Have you applied for a job with us before? Yes No

Have you ever worked for us before? Yes No

How did you come to apply? Employee Referral

Former Employee High School Recruitment

College Recruitment Newspaper Ad

Walk-In Other: _____

Have you ever been bonded? Yes No

Have you ever been refused a bond? Yes No

If so, state reason and date: _____

Have you ever served in the U.S. Armed Forces? Yes No If yes, branch _____
Date Entered _____ Date Discharged _____

Have you ever been convicted of a violation of the law except a minor traffic violation? Yes No If so, state date, court, and place where offense occurred. _____

Have you ever been discharged or requested to resign from a position? Yes No Are you employed now? Yes No

If yes, may we contact your present employer? Yes No

Why do you desire to make a change? because I need job, for my self and child.

Have you ever held a position of trust (handling money or confidential material)? Yes No

Do you have any reason to believe that you would have difficulty meeting this company's work schedules? Yes No

If yes, explain _____

HAVE YOU EVER RECEIVED DISABILITY OR WORKMENS'S COMPENSATION ON A PROBLEM RELATED TO THE ABOVE. IF YES, PLEASE EXPLAIN. NO

WHICH SHIFT DO YOU PREFER TO WORK DAY NIGHT

WHAT TYPE OF JOBS HAVE YOU HAD Compress, STAFF

WHAT WERE YOUR RESPONSIBILITIES Dealing with cotton, Deal with people.

WHAT DID YOU LIKE/DISLIKE ABOUT YOUR LAST JOB I enjoyed my self and other

MAY WE CONTACT YOUR FORMER EMPLOYER (YES) (NO)

NAME: Sandra Kemp

DATE: 4-11-98

NAME

Linda Kim

DATE

4-11-94

A. JOB DESCRIPTION

UTILITY LABORER

OPERATION OF FILLING EQUIPMENT, BAG SEALING EQUIPMENT OR BOX SEALING EQUIPMENT & POSSIBLE FORK TRUCK OPERATION IN A DRY PESTICIDE ENVIRONMENT & MAINTAIN GENERAL HOUSEKEEPING AND SAFETY STANDARDS

B. JOB QUALIFICATIONS/REQUIREMENTS

1. HIGH SCHOOL DIPLOMA OR EQUIVALENT OR EXPERIENCE ON FACTORY LINES
2. GOOD WRITING AND READING SKILLS
3. GOOD COMMUNICATION SKILLS AND ABILITY TO WORK WITH OTHERS
4. ABILITY TO SWING SHIFTS ~~(YES)~~ (NO)
5. ABILITY TO WORK 12 HOUR SCHEDULES INCLUDING WEEKENDS
6. ABILITY TO LIFT UP TO 60 LBS. OR ROLL UP TO 150# DRUM ON ITS EDGE DURING A 12 HOUR BASIC SHIFT ~~(YES)~~ (NO)
7. ABILITY TO WORK ON YOUR FEET FOR EXTENDED PERIODS AS MUCH AS 12 HOURS ~~(YES)~~ (NO)
8. ABILITY TO WORK WITH UNLIMITED USE OF YOUR BACK, NECK, SHOULDERS, ELBOWS, HANDS, HIP, KNEES, ANKLE & FEET UNDER LOADS IN THE WORK ENVIRONMENT ~~(YES)~~ (NO)
9. ABILITY TO WEAR ALL PERSONAL SAFETY EQUIPMENT, SUCH AS RUBBER GLOVES, SAFETY GLASSES, RESPIRATOR & BUMP HATS ~~(YES)~~ (NO)

C. QUESTIONS MAY ASK APPLICANTS

AS NOTED ABOVE IN JOB QUALIFICATIONS/REQUIREMENTS, BELOW IS A LIST OF EXAMPLES THAT MAY HINDER THE PERFORMANCE OF DUTIES REQUIRED FOR A 12 HOUR SHIFT:

LIFTING

THESE ARE EXAMPLES OF, BUT NOT LIMITED TO:
JOINT, MUSCLE, FOOT, KNEE, HIP, BACK & NECK

WALKING

RESPIRATOR

THESE ARE EXAMPLES OF, BUT NOT LIMITED TO:
PROBLEMS WITH ASTHMA, EMPHYSEMA, BLOOD PRESSURE, HEART, LUNGS OR CLAUSTROPHOBIA

IF ANY OTHERS, PLEASE EXPLAIN:

APPLICATION FOR EMPLOYMENT

AN
EQUAL
OPPORTUNITY
EMPLOYER

All statements made by applicants for employment on this application form will be checked for accuracy. We offer equal employment opportunities to all persons without regard to race, color, religion, age, marital or veterans' status, sex, national origin, disability, or any other legally protected status.

AN
EQUAL
OPPORTUNITY
EMPLOYER

PERSONAL INFORMATION

Name (Print) Erreven Banks II Home or Nearest Phone 627-5531
 Present Address PO Box 132 Emergency Phone Number _____
Farrell MS 38422 Social Security No. 287 195 1538
 (City) (State) (Zip)

If at present address less than one year, please give Previous Address _____

Are you over the age of 18? Yes No If No, employment is subject to verification that you are of minimum legal age.

Are you prevented from lawfully becoming employed in this country because of Visa or Immigration status? Yes No

Can you produce documented proof of your eligibility for employment in the United States? Yes No
 (Either driver's license and Social Security card/birth certificate OR Immigration and Naturalization Service Documents)

Position(s) applied for Cosigning How soon could you report to work? Soon

Type of employment Full-Time Part-Time Temporary Rate of Pay Expected Min. Wage

What days and hours, if part time? Days 7 5 Hours 7 5
 From () AM () PM To () AM () PM

EDUCATION

Type of School	Name and Address of School	Courses Majored In	Check Last Year Completed				Graduate? Give Degree
			5	6	7	8	
Elementary							
High School	<u>Cookham County</u>					<u>12</u>	<u>Yes</u>
College	<u>M.D.C.</u>	<u>P.E.</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>No</u>

Have you applied for a job with us before? Yes No

Have you ever worked for us before? Yes No

How did you come to apply? Employee Referral

Former Employee

High School Recruitment

College Recruitment Newspaper Ad

Walk-In

Other: _____

Have you ever been bonded? Yes No

Have you ever been refused a bond? Yes No

If so, state reason and date: _____

Have you ever served in the U.S. Armed Forces? Yes No

If yes, branch _____

Date Entered _____

Date Discharged _____

Have you ever been convicted of a violation of the law except a minor traffic violation? Yes No If so, state date, court, and place where offense occurred. _____

Have you ever been discharged or requested to resign from a position? Yes No Are you employed now? Yes No

If yes, may we contact your present employer? Yes No

Why do you desire to make a change? _____

Have you ever held a position of trust (handling money or confidential material)? Yes No

Do you have any reason to believe that you would have difficulty meeting this company's work schedules? Yes No

If yes, explain _____

NAME Freeman H. Ba

DATE 11-11-54

A. JOB DESCRIPTION

UTILITY LABORER

OPERATION OF FILLING EQUIPMENT, BAG SEALING EQUIPMENT OR BOX SEALING EQUIPMENT & POSSIBLE FORK TRUCK OPERATION IN A DRY PESTICIDE ENVIRONMENT & MAINTAIN GENERAL HOUSEKEEPING AND SAFETY STANDARDS

B. JOB QUALIFICATIONS/REQUIREMENTS

1. HIGH SCHOOL DIPLOMA OR EQUIVALENT OR EXPERIENCE ON FACTORY LINES
2. GOOD WRITING AND READING SKILLS
3. GOOD COMMUNICATION SKILLS AND ABILITY TO WORK WITH OTHERS
4. ABILITY TO SWING SHIFTS (YES) (NO)
5. ABILITY TO WORK 12 HOUR SCHEDULES INCLUDING WEEKENDS
6. ABILITY TO LIFT UP TO 60 LBS. OR ROLL UP TO 150# DRUM ON ITS EDGE DURING A 12 HOUR BASIC SHIFT ((YES) (NO)
7. ABILITY TO WORK ON YOUR FEET FOR EXTENDED PERIODS AS MUCH AS 12 HOURS (YES) (NO)
8. ABILITY TO WORK WITH LIMITED USE OF YOUR BACK, NECK, SHOULDERS, ELBOWS, HANDS, HIP, KNEES, ANKLE & FEET UNDER LOADS IN THE WORK ENVIRONMENT (YES) (NO)
9. ABILITY TO WEAR ALL PERSONAL SAFETY EQUIPMENT, SUCH AS RUBBER GLOVES, SAFETY GLASSES, RESPIRATOR & BUMP HATS (YES) (NO)

C. QUESTIONS MAY ASK APPLICANTS

AS NOTED ABOVE IN JOB QUALIFICATIONS/REQUIREMENTS, BELOW IS A LIST OF EXAMPLES THAT MAY HINDER THE PERFORMANCE OF DUTIES REQUIRED FOR A 12 HOUR SHIFT:

LIFTING	THESE ARE EXAMPLES OF, BUT NOT LIMITED TO: JOINT, MUSCLE, FOOT, KNEE, HIP, BACK & NECK
WALKING	
RESPIRATOR	THESE ARE EXAMPLES OF, BUT NOT LIMITED TO: PROBLEMS WITH ASTHMA, EMPHYSEMA, BLOOD PRESSURE, HEART, LUNGS OR CLAUSTROPHOBIA

IF ANY OTHERS, PLEASE EXPLAIN: _____

HAVE YOU EVER RECEIVED DISABILITY OR WORKMENS'S COMPENSATION ON A PROBLEM
RELATED TO THE ABOVE. IF YES, PLEASE EXPLAIN. No

WHICH SHIFT DO YOU PREFER TO WORK DAY _____ NIGHT ✓

WHAT TYPE OF JOBS HAVE YOU HAD Stock man

WHAT WERE YOUR RESPONSIBILITIES Bigges and Food

WHAT DID YOU LIKE/DISLIKE ABOUT YOUR LAST JOB Nothing

MAY WE CONTACT YOUR FORMER EMPLOYER (YES) (NO)

NAME: Freeman H. BANKS II

DATE: 11-11-91



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE COPY

April 21, 1994

David Coleman
Red Panther Chemical Company
P. O. Box 550
Clarksdale, Mississippi 38614

Dear Mr. Coleman,

Due to the nature of the violations of Mississippi Hazardous Waste Management Regulations no penalty is recommended against Red Panther Chemical. Since the two violations were both paper work violations, which were corrected by Red Panther, and no other violations were found the only enforcement action is the original Notice of Violation (NOV) letter. Thank you for your time and cooperation in this matter. If I can be of any assistance in the future, please don't hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard Harrell".

Richard Harrell
Hazardous Waste Division